

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y., *et al.*

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi, *et al.*

DEFENDANTS

**DECLARATION OF W. WAYNE DRINKWATER, JR.**

1. I am W. Wayne Drinkwater, Jr. Together with Marcia Robinson Lowry, I have served as co-lead counsel for the Plaintiff Class in this case. I am a member of the law firm Bradley Arant Rose & White, LLP, and I am the partner responsible for supervision of my firm's work on this case. I give this Declaration in support of Plaintiffs' Unopposed Motion for Approval of Settlement Regarding Plaintiffs' Attorneys' Fees and Order of Notice to the Class.
2. I am a member of the Bar of this Court and the Mississippi State Bar, and have also been admitted to the Bars of the United States Supreme Court, the United States Court of Appeals for the Fifth Circuit, and the United States District Court for the Northern District of Mississippi. I am a 1974 graduate of the University of Mississippi School of Law. Prior to the commencement of private practice, I served as law clerk to Chief Judge William C. Keady of the United States District Court for the Northern District of Mississippi and to Chief Justice Warren E. Burger of the United States Supreme Court. Since 1977, I have continuously engaged in the private practice of law in Mississippi.
3. My law practice is devoted to trial and appellate litigation, with emphasis on business and commercial litigation. I am a member of the American Bar

- Association and the Mississippi Bar Association, and have served as Bar Commissioner and Second Vice President of the Mississippi Bar Association. I have been recognized through peer review in Woodward/White's "Best Lawyers in America" and am a fellow of the American College of Trial Lawyers, the American Academy of Appellate Lawyers, and the American Law Institute. I am also a member of the Mississippi Defense Lawyers Association.
4. Over my past 30 years of practice, I have become familiar with the economics of law practice, billing rates, billing practices, the cost and recovery of litigation support services (including the services of expert witnesses and consultants), and the setting and collection of legal fees in a variety of circumstances, including cases presenting professional demands, factual and legal complexity, and risk and expense levels comparable to the instant case. I have derived this knowledge from personal experience negotiating fee agreements with sophisticated consumers of legal services, billing and collecting fees and expenses from clients and/or adverse parties in the legal marketplace, and regularly representing plaintiffs and defendants on an hourly rate basis as well as on contingent or hybrid hourly/contingent fee agreements. I have also derived this knowledge from management responsibilities at my law firm, bar activities at the local, state and national level, and practice experience supervising other lawyers and law firms.
  5. I am familiar with my firm's policies, practices and procedures governing the recording and maintenance of time and expense records at Bradley Arant Rose & White, LLP ("Bradley Arant"). I am also familiar with Bradley Arant's standard hourly rates customarily charged for professional services delivered to clients. It

is Bradley Arant's regular practice to independently bill clients for work performed by paralegals and summer law clerks. In my experience, this is also standard practice among other law practitioners in my jurisdiction.

6. Attachment A to this Declaration is a compilation of a) the total billable hours performed by Bradley Arant lawyers on this case through January 4, 2008, and b) case expenses advanced by Bradley Arant in this case through January 4, 2008.

The compilation of itemized time records and the compilation of case expenses set forth in Attachment A were both generated from a database of entries created in the ordinary course of Bradley Arant's business by persons with actual knowledge of the events recorded at or about the time of the events recorded, and which have been maintained in the ordinary course of Bradley Arant's business. I have reviewed the entries in compilation and reduced any charges that I deemed inappropriate. I believe these compilations of the time and expense records to be a reliable account of the work that they reflect and the expenses incurred by Bradley Arant and its personnel in this case.

7. From the inception of our work on this case, I have personally supervised and managed the work of Bradley Arant personnel. I personally reviewed each of the time entries charged to this case and exercised ordinary billing judgment in writing down or writing off charges I deemed inappropriate from the itemization of time records attached as Attachment A.

8. Although over a dozen Bradley Arant attorneys, legal assistants and law clerks expended hours in this matter, Plaintiffs have agreed to receive reimbursement only for hours expended by myself and then-Bradley Arant attorney Melody

McAnally. Melody McAnally is a 2003 graduate of the Mississippi College School of Law, where she was Editor-in-Chief of the Mississippi College Law Review. She is a member of the Mississippi State Bar, the Tennessee State Bar, the Bar of the United States Court of Appeals for the Fifth Circuit, and the Bar of the United States District Courts for the Northern and Southern Districts of Mississippi.

9. The work required to prosecute this case over the past three years is detailed in Attachment A and in the time records submitted in conjunction with the Declaration of Marcia Robinson Lowry. This undertaking was comparable in scope, time demands, expense, and professional challenge to a major piece of class action business or employment litigation. Pre-suit investigation and planning began over a year before the initial complaint was filed. The work entailed intense factual investigation, the selection of appropriate class representatives and Next Friends, and the vetting of available legal theories that might be asserted to advance the class' interests in achieving systemic reform. The pre-filing work required careful analysis of the feasibility of achieving class certification. A complaint satisfying Rule 11 requirements had to be drafted, researched, and vetted. After the Complaint was filed, preparation of the case required extensive, fact-intensive discovery, including the preparation of interrogatories and requests for production, review and analysis of hundreds of thousands of documents, and the deposition of 27 fact witnesses. Plaintiffs worked with five experts to document ongoing agency failures and harms to the Named Plaintiffs and the Plaintiff Class. Plaintiffs defended the depositions of

Plaintiffs' five experts, as well as the depositions of six Next Friends. Plaintiffs also participated in numerous court conferences that were held to address contested scheduling and pre-trial matters. Further, the litigation in this case involved two extensively briefed motions to dismiss, a motion for class certification, cross-motions for summary judgment, and numerous discovery motions.

10. The parties' Fees Agreement represents attorney rates well below Plaintiffs' regular rates. My ordinary rate of compensation for work performed in 2007 is \$415 per hour. Under the parties' Fees Agreement, I will be compensated at \$225 per hour. Ms. McAnally's time is being compensated at \$140 per hour, as opposed to her regular 2007 billing rate of \$205 per hour. These rates are fair, reasonable and consistent with the hourly rates in the Mississippi marketplace for the price of legal services of comparable quality rendered in cases demanding similar skill, judgment and performance.
11. Plaintiffs expended a total of \$622,936.67 in out-of-pocket costs, including \$244,214.94 in non-reimbursable expert costs, in the prosecution of this suit. \$30,942.77 of this amount are the costs expended by Bradley Arant to prosecute this action. (*See* Attachment A). These expenses were reasonable and necessary to protect the interests of the class.
12. I am generally familiar with fee requests and fee awards made in other Rule 23 cases in this District, in the Fifth Circuit, and in the state courts of Mississippi.

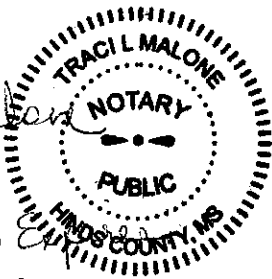
Given the risks apparent at the outset of this case and the costs required to prosecute these claims, it is my opinion and belief that counsel with the experience and qualifications to perform the work and to make the investment required in this case would have found this endeavor extremely unattractive from a cost and risk perspective, considering the out-of-pocket expenses advanced by Plaintiffs and the fact that class counsel's compensation was entirely contingent upon prevailing in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of April, 2008.

*W. Wayne Drinkwater, Jr.*  
W. Wayne Drinkwater, Jr.

*Traci L. Malone*



*My Commission Expires*  
*September 17, 2009*

# ATTACHMENT A

\*\*\*\*\*PLEASE RETURN TO BILLING DEPARTMENT AS SOON AS POSSIBLE\*\*\*\*\*

BILLING ATTORNEY: W. WAYNE DRINKWATER, INC.  
CLIENT NAME: CHILDREN'S RIGHTS, INC.  
C1714-72854 MISSISSIPPI LITIGATION

BILLING ADDRESS:

CHILDREN'S RIGHTS, INC.  
SHIRIM NOTHENBERG, STAFF ATTORNEY  
404 PARK AVENUE SOUTH  
NEW YORK, NY 10016

CLIENT ADDRESS:

CHILDREN'S RIGHTS, INC.  
SHIRIM NOTHENBERG, STAFF ATTORNEY  
404 PARK AVENUE SOUTH  
NEW YORK, NY 10016

Time Start: 01/01/80  
Time End: 11/14/07  
Disb Start: 01/01/80  
Disb End: 11/14/07  
Billing Frequency: M  
Bill Format: ML  
Fee Basis: Hourly  
Rate Code: 1  
Exception rates, if applicable:  
MATTER TITLE ALL  
- 100.00 %

Billing Instructions: PRO BONO

TIME SUMMARY BY TIMEKEEPER

Attorney	Hours	Standard Value	Worked Value	Adjusted Value	Amount To Bill	\$/hr	Last WIP Date
AMIL ALYSSON MILLS	18.40	2,760.00	0.00	0.00		0.00	05/18/07
CWEB CLARENCE WEBSTER	4.35	652.50	0.00	0.00		0.00	06/21/05
ERU EMILY RUTH	3.40	289.00	0.00	0.00		0.00	03/26/04
JGAL JEANETTE ALTOBELLI	69.80	8,687.50	0.00	0.00		0.00	06/12/07
JMS JEREMY M. SIMMONS	0.50	37.50	0.00	0.00		0.00	01/04/06
KLM KATIE LOFTON WALKER	1.00	130.00	0.00	0.00		0.00	06/23/04
KRP KELLY R. PHELPS	0.60	63.00	0.00	0.00		0.00	04/25/06
MIM MELODY I. MCANALLY	1,082.85	204,022.50	0.00	0.00		0.00	11/13/07
MOC MARGARET O. CUPPLES	1.60	376.00	0.00	0.00		0.00	07/14/04
NWN NIKI NIX	3.50	245.00	0.00	0.00		0.00	03/26/04
PGW PAMELA G. WINKLER	0.70	87.50	0.00	0.00		0.00	03/31/06
RPH RONICE F. HAMMONS	4.30	473.00	0.00	0.00		0.00	08/25/04
TRW TIFFANY R. WOODS	1.80	225.00	0.00	0.00		0.00	06/29/06
WWD W. WAYNE DRINKWATER, JR.	115.00	45,592.00	0.00	0.00		0.00	11/01/07
Grand Total Fees	1,307.80	263,640.50	0.00	0.00		0.00	



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## Attorney

Grand Total Disbursements

Standard Value	Worked Value	Adjusted Value	Amount To Bill	\$/hr	Last WIP Date
30,726.17	30,726.17	30,726.17			
294,366.67	30,726.17	30,726.17			

## DISBURSEMENT CODE SUMMARY

Code	Description	Amount	Quan
01	Copy Charges	14,710.85	98130
01A	Copy Charges - OUTSIDE SOURCES	2,016.65	16
07	Filing Fees	175.00	4
09	Certified Copies	0.00	2
13	Court Reporter Charges	1,214.15	6
14	Transcript Charges	489.55	1
21	Travel Expense	433.67	3
23	Meal Expense	1,490.48	26
28	Professional Consultant Services	1,318.40	1
30	Miscellaneous Expense	980.16	5
35	Express Mail	5,569.11	87
35B	Express Mail	44.66	2
41	Computerized Legal Research-Westlaw	1,036.06	17
44	Computerized Research-Case Management	11.20	1
58	FED DOCKET SERV-PACER	5.12	1
70	Ready Conference	1,231.11	2
	Total Disbursements	30,726.17	

## DETAIL FEES

Atty	Date	Hours Worked/Billable	\$'s Worked/Billable	Status	Description of Services Rendered	Index	Task	Activity
WWD	01/14/04	3.00	0.00	B	(Mississippi Department of Human Services) - conference with M.Lowry, J.Lang, S.Nothenberg re possible lawsuit, claims; general discussions	4507216		

MIM	02/17/04	4.00	0.00	B	Review draft complaint; discuss draft complaint with W. Drinkwater; telephone conference call with W. Drinkwater, Marcia Lowry, Shirim Nothenberg, Steve Leech, Chris Carbome re draft complaint, named plaintiffs and continued search for named plaintiffs, media strategy, local rules for the Northern and Southern Districts of Miss. and community outreach contacts; discuss possible media contacts	4506803		
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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
WWD	02/17/04	1.00	0.00 0.00	B	Conference call on case; review proposed complaint	4507258		
MM	02/25/04	0.25	0.00 0.00	B	Edit and revise memo to Shirim Nothenberg re. Miss. media contacts; email memo to Shirim Nothenberg and provide W. Drinkwater a copy for telephone conference call	4517905		
WWD	02/25/04	1.00	0.00 0.00	B	Work on complaint; participate in conference call re complaint	4523260		
MM	03/10/04	1.50	0.00 0.00	B	Review memorandums from Childrens' Rights re. named plaintiffs and status of complaint; telephone conference call with Childrens' Rights, W. Drinkwater, Loeb and Loeb and Stephen Leech	4542714		
MM	03/17/04	1.25	0.00 0.00	B	Telephone conference with Rob McDuff re. meeting with Martha Bergmark and community activists; conference with W. Drinkwater re. today's meeting with Miss. Center for Justice staff and community children's activists; review updated Complaint; telephone message for Martha Bergmark	4549463		
MM	03/18/04	3.50	0.00 0.00	B	Telephone conference with Martha Bergmark of the Miss. Center for Justice re. Center's organization of community children's activists	4549489		

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Atty	Date	Hours worked/ Billable	\$'s worked/ Billable	Status	Description of Services Rendered	Index Task Activity
MIM	03/19/04	0.25	0.00	B	Telephone conference call with Carrie Carpenter re. conference call on 3/22 and biographical info.; email to K. Newton requesting copies of biographical info.	45549813
MIM	03/22/04	2.00	0.00	B	Email biographical information for W. Drinkwater and M. McNally to Carrie Carpenter; review final draft of the Miss. media strategy for the Miss. litigation emailed from Carrie Carpenter; telephone conference with Clerk of the U.S. District Court for the Northern District of Miss. re. assignment of judges; telephone conference with Clerk of the U.S. District Court for the Southern District of Miss. re. assignment of judges; draft memo to W. Drinkwater re. assignment of judges in Northern and Southern Districts of Miss.	4554002
MIM	03/23/04	0.75	0.00	B	Request Miss. media guide from Bellsouth Communications; edit biographical information; email to Carrie Carpenter; review Miss. media guide and make notations for Carrie Carpenter re. media to contact for litigation and fax to Carrie Carpenter	4555850
JGAL	03/24/04	2.50	0.00	B	Assist W Drinkwater with preparation for meeting; assist with Child and Family Service Assessment print-out	4554967

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Atty MIM	Date 03/24/04	Hours Worked/ Billable 2.00	\$'s Worked/ Billable 0.00	Status B	Description of Services Rendered	Index 4555900	Task Activity
					Meeting with W. Drinkwater, S. Leech, M. Lowry, S. Nothenberg, C. Kendrick, C. Carbone and J. Lang re. finalize complaint, discuss media strategy and discuss class-action certification; conference call with Carrie Carpenter and W. Drinkwater re. exclusive media coverage with Clarion Ledger reporter Grace Simmons		
WWD	03/24/04	3.50	0.00 0.00	B	Participate in meeting with Nothenberg, Lowry, Lang, Corbone, McAnally, Luch; work on complaint, class action issues, discovery questions, expert issues	4556180	
MIM	03/25/04	1.25	0.00 0.00	B	Conference with W. Drinkwater re. filing complaint; telephone call to Clarion Ledger reporter; edit Fact Sheet; telephone conference with S. Nothenberg re. Fact Sheet and Complaint; email to and from J. Altobelli re. procedure for filing complaint	4564200	
ERU	03/26/04	3.40	0.00 0.00	B	Prepare notebook containing fact memorandums and other documents requested by M. McAnally for attorney's review in preparation of filing complaint	4569972	
MIM	03/26/04	6.00	0.00 0.00	B	Conference with W. Drinkwater re. Clarion Ledger interview on Monday; conference with paralegals re. organization of file and media interview notebook with complaint documents, fact memos and statutes; review fact memos and mark those relevant to named plaintiffs; review complaint and mark all state and federal statutes cited; review media interview notebook	4564379	
NWN	03/26/04	3.50	0.00 0.00	B	Conference with M. McAnally regarding update of file and	4557969	

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
JGAL	03/29/04	2.50	0.00 0.00	B	Revise caption, prepare civil cover sheet and summons and other preparation for filing complaint	4563831		
MIM	03/29/04	8.00	0.00 0.00	B	Review e-mails from Children's Rights regarding final draft of complaint, pro hac vice papers, class certification motion and brief in support of, media packet, revisions to final draft of complaint, caption for complaint and class certification motion and brief, fact memos regarding named plaintiffs, table of contents to complaint, table of contents and authorities to class certification motion and brief; revise and edit fact sheet and attorney's biographies to Clarion Ledger reporter Jimmy Gates regarding interview of WDrinkwater and filing of complaint; telephone conference with Shirim Nothenberg, Marcia Lowry, Eric Thompson, Susan Lambiase, Corene Kendrick and Carrie Carpenter regarding timing of filing of complaint and exclusive interview of WDrinkwater with Clarion Ledger; review list of Miss. media and e-mail to Carrie Carpenter; telephone conference Carrie Carpenter regarding New York Times coverage of story; review fact memos regarding named Plaintiff's and mark for WDrinkwater's review; review Miss. R. Civ. P. 4 regarding Service of Summons and complaint on Governor; telephone conference with Attorney General's office regarding serving the Governor	4564909		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
JGAL	03/30/04	7.00	0.00	B	Assist with finalization of complaint, motion for class certification, and supporting brief; prepare all for filing and file with clerk's office	4560403		
MIM	03/30/04	7.00	0.00	B	Review emails from Children's Rights team re. changes to complaint, table of authorities, and filing complaint; email to and from C. Carpenter re. media packet changes; review M. Lowry's affidavit to the motion for class certification; review letters from various state officials and advocates documenting prior attempts to change Miss.'s child welfare system; review complaint, motion for class certification, brief in support of motion for class certification with exhibit of M. Lowry's affidavit, cover letters; work with paralegal to prepare final documents for filing complaint; file complaint with U.S. District Court for the Southern District of Miss. Jackson Division; prepare cover letter for Judge Tom Lee re. brief in support of motion for class certification; telephone conference with Attorney General's office re. serving summons on Governor	4564736		
WWD	03/30/04	1.50	0.00	B	Finalize and file complaint, class action certification motion, class brief; telephone conferences with M. Lowry, C. Carpenter, S. Carpenter	4561158		
MIM	03/31/04	1.75	0.00	B	Conference with W. Drinkwater re. media coverage; emails to and from S. Nothenberg re. Table of Authorities to Brief in Support of Class Certification; check on status of summons with Clerk; review Table of Authorities for errors; email to and from C. Carpenter re. errors in AP report; email to and from Loeb & Loeb re.	4565018		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered errors in AP report; review media articles	Index Task Activity
WWD	03/31/04	0.50	0.00 0.00	B	Telephone conferences with potential witnesses, persons who have complaints against DHS	4568158
JGAL	04/01/04	0.50	0.00 0.00	B	Revise motion for pro hac admission papers	4571562
MIM	04/01/04	6.50	0.00 0.00	B	Emails to and from Children's Rights, Inc. re: errors in Table of Authorities to Memo in Support of Motion for Class Certification; Shirim's follow-up conversation with Ed Theiss; New York Times article; Shirim's follow-up conversation with Ed Theiss; New York Times article; conference with W. Drinkwater re. making corrections to Table of Authorities; telephone conference with Judge Tom Lee's law clerk re. proper procedure for correcting clerical errors in Table of Authorities; telephone conference with District Court Clerk's office re. proper procedure for correcting clerical errors in Table of Authorities; draft letter to District Court Clerk re. attachment of corrected copy of Table of Authorities; draft letter to Judge Tom Lee re. attachment of corrected copy of Table of Authorities; edit and revise Table of Authorities; telephone conference with Caroline Rothert re. corrections to Table of Authorities; review email from C. Rothert re. corrected Table of Authorities; hand-deliver cover letter to District Court Clerk and Judge Tom Lee with attached corrected copy of Table of Authorities; serve summons and pleadings to Defendants per Mike Langford of Miss. Attorney General's Office	4571348
WWD	04/01/04	0.40	0.00	B		4572500

Proforma Batch/Number		406153 / 595519	11/14/07	Billing Attorney: W. WAYNE DRINKWATER, Matter No. C1714-72854		Page 9 (9)
Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index Task Activity
MIM	04/02/04	5.00	0.00 0.00	B	Review emails from: Geri Papa, Loeb & Loeb, re. pro hac vice motions for John Lang and Chris Carbone; S. Lambiase re. update on service of process; from team re. hotline idea for intake of fact witness telephone calls; review pro hac vice motions and affidavits received from Children's Rights; draft pro hac vice motions; draft cover letter to Clerk attaching motions for pro hac vice motions for S. Nothenberg, E. Thompson, M. Lowry and S. Lambiase; draft cover letter to Clerk attaching return of service of process for filing; review Rule 82.1 of Uniform Local Rules for the Northern and Southern Districts of Miss. re. admission pro hac vice requirements; conference with W. Drinkwater and paralegal re. return of service of process requirements; conference with W. Drinkwater re. organizing and filing fact witness memos; interview with Wayne Sorge of Miss. Public Broadcasting	4572030
RFH	04/02/04	1.80	0.00 0.00	B	Reviewed Motion to Admit Pro Hac Vice, organized exhibits for same; telephone conference with court clerk regarding filing requirement; review of pleadings for information requested by counsel, M. McNally	4589508
MIM	04/05/04	6.00	0.00 0.00	B	Scan and email copies of pro hac vice motions for E. Thompson, M. Lowry, S. Nothenberg and S. Lambiase to Caroline Rothert and S. Nothenberg; review Miss. Lawyer article by Billie Graham regarding D.H.S.; scan and email article to the CRI team; telephone conference	4591647



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Atty	Date	Hours worked/ Billable	\$'s worked/ Billable	Status
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Index Task Activity

Description of Services Rendered with W.Drinkwater regarding Billie Graham; telephone conference with Kathy Harris regarding abused nephew; telephone conference with unnamed contact regarding reported abuse; draft memo to file summarizing telephone conference with Kathy Harris and anonymous contact; review emails from: Geri Papa regarding Loeb & Loeb pro hac vice motions and affidavits; scan and email to Geri Papa Uniform local Rule 82.1 of the Southern District of Mississippi; email to Geri Papa copy of pro hac vice motion for E.Thompson as example; Carrie Carpenter regarding media interviews for CRI meeting Wednesday; telephone conference with Emily Wagster Pettus regarding interview with W.Drinkwater and Marcia; telephone conference with Carnie Carpenter regarding media interviews with Mississippi Media on Wednesday; review emails from CRI team regarding hotline idea; draft motion for pro hac vice admission for C.Kendrick, J.Lang and C.Carbone

MM	04/06/04	5.00	0.00 0.00	B
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4591605

Conference with W.Drinkwater regarding contacting Mike Moore, requesting tape of Wayne Sorge/MPB interview for transcription, contacting Rep. Steve Holland and other legislators; draft Motions for Pro Hac Vice for Chris Carbone and John Lang; review W.Drinkwater's notes transcribed for media interviews; telephone conference with Attorney Billie Graham, Laurel, regarding her article in Miss. Lawyer magazine on Mississippi's child welfare system; review emails: C.Carpenter regarding press release for infoline; M.Lowry regarding infoline; email Wayne Sorge at Miss. Public Broadcasting requesting tape of story

MM	04/07/04	7.00	0.00	B
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4591654

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task Activity
			0.00				
WWD	04/07/04	3.50	0.00	B	Meet with M.Lowry, J.Lang, S.Nothenberg, M.McAnally; work on discovery, case management; telephone conference with H.Pizzetta	4577951	
MIM	04/08/04	1.00	0.00	B	Telephone conference with Mike Moore re. participation in class-action lawsuit; draft cover letter to Mike Moore along with copy of Complaint; draft memo to the file re. telephone conference with Mike Moore	4581019	
MIM	04/09/04	0.50	0.00	B	Review D.F.C.S.'s manual of rules/regulations; conference with staff re. copying, binding and labeling D.F.C.S. manual; review memo from Corene Kendrick re. potential named plaintiff to add to Complaint	4581051	
MIM	04/12/04	1.00	0.00	B	Review draft of Plaintiffs' discovery requests; review email from John Lang re. comments on draft of Plaintiffs' discovery requests	4581154	
MIM	04/13/04	0.50	0.00	B	Review email and memo from Shirim Nothenberg re. potential named plaintiff; review email from John Lang re. suggestions for proposed protective order and proposed non-interference order	4578693	

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Atty MIM Date 04/15/04 Hours Worked/Billable 2.50

\$'s Worked/Billable 0.00

Status B

Description of Services Rendered  
Review media file, compile and copy press articles and other documents for media packet for reporter Bill Minor; interview with Bill Minor along with W. Drinkwater

Index Task Activity  
4581260

MIM 04/16/04 3.75

0.00

B

Telephone conference with fact witness Jodie Felton; draft memo to the file re. telephone conference with Ms. Felton; telephone conference with Terry Scott; draft memo to the file re. telephone conference with Terry Scott; review emails from S. Nothenberg re. attorney conference and case management conference; conference with W. Drinkwater re. status of attorney conference with Harold Pizetta; email to team re. W. Drinkwater's status of attempting to set attorney conference and extending Defendants time to serve responsive pleading

4598621

MIM 04/19/04 2.25

0.00

B

Review Local Rules for the Northern and Southern Districts of Miss. for Initial Scheduling Order/Case Management Order; telephone conference with W. Drinkwater, S. Nothenberg, C. Kendrick re. W. Drinkwater's telephone conference with Harold Pizetta and with Court Clerk on attempting to set case management conference and extending Defendants' time to serve responsive pleading; telephone message to Mike Moore; finish draft of memo to file re. Terry Scott

4598638

WWD 04/19/04 0.20

0.00

B

Telephone conference with H. Pizetta, clerk's office re extension of time to answer; attorney's conference, case management conference

4585831

MIM 04/20/04 1.00

0.00

B

4598660

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity	
			0.00		Email to and from S. Nothenberg re. conference with Court Clerk on expedited case management conference; review memo received from S. Nothenberg re. potential named plaintiffs to add to Complaint				
MIM	04/21/04	0.75	0.00	B	Review Orders granting pro hac vice admission for M. Lowry, E. Thompson, C. Kendrick, S. Lambiase, S. Nothenberg, C. Carbone, E. Manne and J. Lang; scan and email copies of pro hac vice admissions to M. Lowry, E. Thompson, C. Kendrick, S. Lambiase, S. Nothenberg, C. Carbone, E. Manne and J. Lang; review emails from W. Drinkwater, C. Carbone, and S. Nothenberg	4598673			
MIM	04/22/04	1.00	0.00	B	Review Defendants' motion for extension of time; email to and from W. Drinkwater re. Defendants' motion for extension of time; review email from S. Nothenberg re. amending complaint; review draft of Amended Complaint; review email from S. Nothenberg re. letter to Harold Pizzetta re. Jamison; review draft letter from S. Nothenberg to Harold Pizzetta re. Jamison	4598691			
MIM	04/23/04	2.00	0.00	B	Review email and reply to S. Nothenberg re. conference call to discuss Jamison situation and plan for addressing Jamison's situation with Defendants; conference call with S. Nothenberg and S. Lambiase re. plan to address Jamison situation with Defendants; conference with W. Drinkwater re. letter to Harold Pizzetta re. Jamison; telephone conference with Jodie Felton re. plan for addressing Jamison's situation with Defendants; review article by Bill Minor; telephone conference with S. Nothenberg re. filing amended complaint; conference with	4598698			

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	04/28/04	4.00	0.00 0.00	B	Review emails from team re. amended complaint; review Clarion ledger article from 4/25/04 re. Billy Mangold comments; telephone conference with fact witness, Linda Newman; email to and from S. Nothenberg re. amended complaint; draft letter to Georgia Pacific general counsel re. soliciting support to fund expert witness fees; telephone conference call with W. Drinkwater, M. Lowry, C. Kendrick and S. Nothenberg re. soliciting support to fund litigation, amending complaint, and letter to Harold Pizzetta re. Jamison; edit and revise Reform Infoline Intake Form with Erick Dickersbach; edit letter to Harold Pizzetta with W. Drinkwater's changes; conference with K. Durham re. hand-delivery of confidential letter to Harold Pizzetta; conference with W. Drinkwater re. his conversation with Harold Pizzetta	4598730		
WWD	04/28/04	0.30	0.00 0.00	B	Letter to H.Pizzetta; telephone conference with Pizzetta re Jamison	4597186		
JGAL	04/29/04	0.40	0.00 0.00	B	Receive and review notice of telephonic case management conference and update calendar with deadlines re case management conference and date of conference	4601552		
MIM	04/29/04	1.50	0.00 0.00	B	Review emails from team re. letter to Harold Pizzetta, amending complaint; email W. Drinkwater's memo re. Ms. Taylor to team; review Initial Scheduling Order received from Court; emails to and from W. Drinkwater re. scheduling order; review articles from New York Times re. federal review of all states' child welfare	4598861		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index Task Activity
MIM	04/30/04	1.00	0.00 0.00	B	Review emails from team re. Scheduling Order and re. conference call to discuss scheduling Order; conference with W. Drinkwater re. Scheduling Order and re. Ms. Taylor situation; telephone conference with S. Leech re. Scheduling Order and Attorney Conference with A.G.'s office and re. W. Drinkwater's letter to Harold Pizzetta re. Jamison	4601434
MIM	05/03/04	2.00	0.00 0.00	B	Conference call with W. Drinkwater, M. Lowry, S. Nothenberg, J. Lang, E. Manne, S. Lambiase, C. Kendrick and S. Leech re. setting Attorney Conference and preparing information for Attorney Conference and Case Management Conference; conference call with W. Drinkwater and Harold Pizzetta re. setting Attorney Conference and re. Demarcus' situation; review emails from team re. upcoming conference call with expert; telephone conference with Linda Newman re. follow-up conversation from last week; email to and from the team re. recommended therapists in Jackson; draft memo to the file re. follow-up conversation with Linda Newman; finalize draft letter to Ken Khoury, Georgia Pacific, re. financial support for experts	4608398
WWD	05/03/04	0.40	0.00 0.00	B	Telephone conference with H. Pizzetta re attorney's conference; letter to Pizzetta confirming conference; conference call M. Lowry, S. Nothenberg, et al. re CMC, attorney's conference, disclosure issues	4612657
MIM	05/04/04	1.00	0.00 0.00	B	Conference call with W. Drinkwater, M. Lowry and	4613573

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task Activity
MTM	05/05/04	1.00	0.00 0.00	B	Email to and from C. Kendrick and S. Nothenberg re. organization to refer Shannon Bardwell and Linda Newman cases; telephone conference with Shannon Bardwell re. referring her case to the Southeast Miss. Legal Services; telephone conference with Linda Newman re. referring her case to the Southeast Miss. Legal Services; telephone message to Southeast Miss. Legal Services re. Bardwell and Newman cases; finalize memo to the file re. Shannon Bardwell telephone conference	4613576	
MTM	05/06/04	1.00	0.00 0.00	B	Conference call with Dr. Diane Depanfiliff, M.Lowry, E.Thompson, C.Rothert, C.Kendrick, C.Carbone, E.Manne and S.Leech re what docs we need to request in discovery to prove our allegations re protective services class; review report from Dr. Depanfiliff for U.S. DHS	4629672	
MTM	05/10/04	1.50	0.00 0.00	B	Telephone conference with E.Thompson re letter to AG on behalf of Jamison; email to W.Drinkwater re status of letter to AG re Jamison; review email from C.Rothert re notes from conference call with Dr. Diane Depanfiliff; review memo from C.Kendrick re Miss. regulations on retention of DHS records; review Sun Herald article re Gov. signing H.B. 816 search, print and review HB 816; scan and email to the team Sun Herald article and HB 816; review email from C.Kendrick; telephone conference with L.Newman re status of referral of her case to Miss. Legal Services	4629675	

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	05/13/04	1.50	0.00	B	Email correspondence with C.Carpenter regarding DHS authority under Governor Barbour; review article regarding legal failure to reauthorize DHS and governor issuing executive order; conference with W.Drinkwater regarding DHS; scan and email letter from H.Pizetta regarding Jamison; email to and from J.Goodman regarding legislation and executive order for DHS; research legislation from 2004; telephone conference with H.Pizetta and W.Drinkwater; review memos in file regarding Jamison; review press release for amended complaint	4629603		
MIM	05/14/04	3.00	0.00	B	Conference with W.Drinkwater re Amended Complaint; draft memo to W.Drinkwater re summary of new named Plaintiffs; telephone conference with C.Carpenter re changes to press release; telephone conference with E.Thompson re filing amended complaint and rescheduling conference call; telephone conference with E.Thompson and M.Lowry re filing/editing amended complaint; review CRI's outline of issues to discuss at attorney conference; email from and to E.Thompson and team re rescheduling conference call to discuss attorney conference; conference with W.Drinkwater re review of amended complaint; email to E.Thompson re W.Drinkwater's comments to amended complaint; email to and from team re rescheduling conference call; review complete Amended Complaint	4629682		
JGAL	05/17/04	0.70	0.00	B	Finalize amended complaint	4621398		
MIM	05/17/04	2.00	0.00	B	Review final draft of Amended Complaint and make revisions; edit and sign cover letter to clerk and	4643410		



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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	05/18/04	2.00	0.00 0.00	B	Conference with W.Drinkwater regarding attorney conference agenda; conference call with S.Leech, M.Lowry, S.Nothenberg, E.Thompson, C.Carbonate, E.Manne, C.Kendrick and W.Drinkwater regarding letter to H.Pizzetta regarding Jamison, status of DHS' existence, and upcoming attorney conference; telephone conference with B.Berryhill and H.Pizzetta regarding upcoming attorney conference; review information on Mississippi Foundations received by G.Mellet; conference with W.Drinkwater regarding soliciting financial support from Mississippi Foundations	4643843		
WWD	05/18/04	1.00	0.00 0.00	B	Prepare for attorney's conference; conference call other counsel; telephone conference with H.Pizzetta; conference with M.McAnally; work on letter to H.Pizzetta re Jamison	4630486		
MIM	05/24/04	2.25	0.00 0.00	B	Review draft settlement memo; review letter to H.Pizzetta and Stipulation; telephone conference with B.Roberts, fact witness; review letter to H.Pizzetta regarding case records review and expert; telephone conference with S.Nothenberg regarding attorney conference; draft memo to W.Drinkwater regarding attorney conference	4644054		
MIM	05/25/04	0.50	0.00 0.00	B	Review email from team; scan and email Amended Complaint to team; draft memo to file regarding summary from S.Nothenberg of	4644317		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered Attorney Conference	Index	Task	Activity
MIM	05/27/04	1.00	0.00 0.00	B	Review Case Management Order; review Attorney General's opinion regarding DHS; review letter from N.Stewart and M.Stewart regarding their problems with DHS; review Plaintiffs' conference settlement memo	4644408		
MIM	05/28/04	0.50	0.00 0.00	B	Review telephone message from Eric Thompson re. W. Drinkwater's most recent letter to Harold Pizetta re. Jamison; review file and scan/email W. Drinkwater's last letter to Harold Pizetta re. Jamison to the team; review email from the team; review Case Management Order from Eric Thompson	4637408		
MIM	06/01/04	1.50	0.00 0.00	B	Review emails from team re. plaintiffs' mandatory disclosure deadline; review draft of plaintiffs' mandatory disclosure; review list of privileged contacts; telephone conference with Billy Berryhill re. defendants' motion to dismiss; conference with Billy Berryhill accepting hand-delivery of defendants' motion to dismiss, motion to stay discovery and motion to stay class certification; review defendants' motion to dismiss, motion to stay discovery and motion to stay class certification; conference with W. Drinkwater re. defendants' response papers and re. requesting in-person case management conference	4647805		
JGAL	06/02/04	1.20	0.00 0.00	B	Assist with initial disclosures, notice of service and confidential settlement memorandum	4650374		
MIM	06/02/04	4.00	0.00 0.00	B	Conference with W. Drinkwater re. defendants' motion to dismiss, motion to stay discovery and	4647205		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
WWD	06/02/04	1.50	0.00 0.00	B	Conference call with Children's Rights, Loeb & Loeb re responses to defendants' motions; work on letter to defendants; telephone conference with E. Thompson	4648212		
MTM	06/03/04	0.25	0.00 0.00	B	Review cases received from S. Nothenberg re. plaintiffs' response to defendants' motion to stay in other states' class action lawsuits; review emails from team re. Kids Count report	4647199		
MTM	06/04/04	2.00	0.00 0.00	B	Email team re. in-person case management conference arrangements for travel; print and review cases from Westlaw re. responding to	4647797		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	06/05/04	2.00	0.00 0.00	B	Review cases from Westlaw re. plaintiffs' response to defendants' motion to stay discovery and motion to stay class certification	4647806		
MIM	06/07/04	2.00	0.00 0.00	B	Conference with W. Drinkwater re. Case Management Conference; telephone conference with W. Drinkwater and S. Leech re. Case Management Conference; email to team re. Case Management Conference status; review letters to Judge Nicols from W. Drinkwater and Harold Pizetta; review letter received from Judge Nicols re. Case Management Conference issues and scan/email to team; telephone conference with W. Drinkwater, S.	4656826		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	06/09/04	0.50	0.00 0.00	B	Review emails from team re. deposition schedules and re. Plaintiffs' response to motion to dismiss; conference with W. Drinkwater re. letter from PACT organization; scan/email PACT letter to team; review emails from team re. PACT letter and offer of support	4656843		
MIM	06/10/04	1.50	0.00 0.00	B	Review emails from team re. conference call agenda; conference with W. Drinkwater re. preparation for conference call with team; telephone conference with W. Drinkwater, S. Nothenberg, M. Lowry, E. Thompson, C. Kendrick, C. Carbone, and S. Leech re. Plaintiffs' response to motion to dismiss, Plaintiffs' response to motion to stay discovery, need for non-retaliation language in confidentiality order, amicus support and Jamison; conference with W. Drinkwater re. points to make in Plaintiffs' response to motion to stay discovery	4656906		
WWD	06/10/04	0.50	0.00 0.00	B	Conference call re response to motion to dismiss, case management conference	4656504		
MIM	06/11/04	3.00	0.00 0.00	B	Draft Plaintiffs' Response in Opposition to Motion to Stay Discovery; research Fifth Circuit cases cited by Defendants in Motion to Stay Discovery	4656925		
MIM	06/12/04	3.00	0.00 0.00	B	Revise/edit Plaintiffs' Response to Motion to Stay; draft confidentiality argument in	4660915		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	06/14/04	6.00	0.00 0.00	B	Conference with W. Drinkwater re. comments/edits to Plaintiffs' Response to Motion to Stay; edit Response to Motion to Stay with W. Drinkwater's comments; conference with M. Cupples re. Response to Motion to Stay; edit Response to Motion to Stay with M. Cupples comments; research all federal cases for denying a motion to stay discovery for children's rights issues; review cases/briefs received from Children's Rights re. denying motions to stay discovery; email to team draft of Plaintiffs' Response to Motion to Stay for comments; review revised introduction to Response to Motion to Stay received from S. Nothenberg; review email with exhibits to Response to Motion to Dismiss; review Children's Rights changes to Response to Motion to Stay and letter to Judge Nicols re. confidentiality order; review email and final draft of brief in opposition to motion to dismiss	4660921		
MIM	06/14/04	0.50	0.00 0.00	B	Telephone conference with Margie Boyd, fact witness	4660923		
MOC	06/14/04	1.20	0.00 0.00	B	Review response to motion to stay discovery and revise same; conference with M. McNally re: same	4656169		
MIM	06/15/04	8.25	0.00 0.00	B	Edit final draft of Plaintiffs' Response to Motion to Stay Discovery; draft cover letter to Clerk and Judge Lee and Judge Nicols re. filing Plaintiffs' Response to Motion to Stay Discovery; file Plaintiffs' Response to Motion to Stay Discovery; telephone conference with Judge Lee re. filing Response	4660927		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
WWD	06/15/04	2.00	0.00 0.00	B	Complete and file responses to motion to stay and motion to dismiss (1.0); prepare for and participate in case management conference (1.0)	4661066		
MM	06/16/04	1.00	0.00 0.00	B	Review email from S. Nothenberg re. update on Jamison; email to and from team re. proposed confidentiality order	4660930		
MM	06/18/04	0.50	0.00 0.00	B	Review emails re. Jamison; review emails re. proposed confidentiality order	4660942		
KLM	06/23/04	1.00	0.00 0.00	B	Look for language in cases regarding "detriment to children"	4669935		
MM	06/23/04	3.00	0.00	B		4683636		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	06/24/04	3.00	0.00 0.00	B	Draft motion for expedited ruling; research federal law regarding harm to children for delay in litigation seeking injunctive relief	4684069		
MIM	06/25/04	2.50	0.00 0.00	B	Edit and revise Motion for Expedited Ruling on Motion to Dismiss; telephone conference with W.Drinkwater, J.Johnson and J.Mann regarding Jackson community event; review emails	4684156		
MIM	06/28/04	0.50	0.00 0.00	B	Email to and from W.Drinkwater regarding invitation list for Jackson information event; review email from team regarding deadline to extend DHS	4684318		
MIM	06/29/04	2.00	0.00 0.00	B	Review emails from team regarding extending DHS authority; review letter from E.Thompson to H.Pizsetta regarding errors in Case Management Order; review letter from H.Pizsetta to E.Thompson regarding errors in Case Management Order; telephone conference with C.Kendrick regarding filing motion for amending Case Management Order; review Motion to Amend Case Management Order and supporting affidavit; conference with W.Drinkwater regarding motion and affidavit; review email from	4684389		



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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	06/30/04	2.75	0.00 0.00	B	Telephone conference with B.Berryhill regarding Plaintiff's filing of motion to extend DHS authorization; conference with W.Drinkwater regarding filing motion to extend DHS authorization; telephone conference with B.Berryhill and W.Drinkwater regarding filing motion to extend DHS authorization; telephone conference with W.Drinkwater, E.Thompson and S.Nothenberg regarding filing motion to extend DHS authorization; telephone filing motion to extend DHS authorization; telephone conference with team regarding filing motion to extend DHS authorization; telephone conference with B.Berryhill regarding AG filing motion to extend DHS authorization	4684488		
MIM	07/01/04	1.00	0.00 0.00	B	Conference call with B.Berryhill and W.Drinkwater re Attorney General's motion and court order re DHS; conference call with W.Drinkwater, M.Lowry, S.Nothenberg, C.Carbonate, S.Leech re Court order and effect on the lawsuit; review Attorney General's motion and review Court order; fax motion and court order to team; review Court Order denying as moot Defendants' motion to stay discovery; scan/email order denying Defendants' motion to team	4685210		
WWD	07/01/04	0.60	0.00 0.00	B	Conference call on receivership, DHS expiration; review chancery court order, AG complaint in chancery court	4685468		
MIM	07/02/04	1.00	0.00 0.00	B	Conference call with W.Drinkwater, S.Leech, M.Lowry, S.Nothenberg, C.Kendrick, E.Thompson, E.Manne	4685594		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
WWD	07/02/04	0.50	0.00 0.00	B	Telephone conference with expert witnesses, management, etc.	4685855		
MIM	07/07/04	0.10	0.00 0.00	B	Review emails re Jamison from E.Thompson and H.Pizzetta	4687254		
MIM	07/09/04	0.50	0.00 0.00	B	Emails to and from team re Defendants' production of Named Plaintiffs' records	4689739		
MIM	07/13/04	1.00	0.00 0.00	B	Review Order granting Plaintiffs' Motion to Amend Case Management Order; scan/email Order to team; review emails from team regarding Order; review email from E.Thompson to Harold Pizzetta regarding scheduling depositions; emails from and to E.Thompson regarding filing notice of deposition; conference with K.Durham regarding deposition notice; conference with M.Cupples regarding filing notice of deposition	4705485		
MIM	07/14/04	2.00	0.00 0.00	B	Email to and from H.Pizzetta regarding scheduling depositions; edit M.Henry and B.Mangold deposition notices; review CMO; telephone conference with E.Thompson regarding scheduling depositions; review F.R.C.P. regarding oral deposition and subpoena request; email to and from M.Cupples regarding motion to quash deposition subpoena	4705497		
MOC	07/14/04	0.40	0.00 0.00	B	Emails to/from M.McAnally and conference with M.McAnally re: deposition subpoenas, motion to quash same	4699333		
MIM	07/16/04	1.75	0.00	B		4723279		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
			0.00		Telephone conference with B. Berryhill and H. Pizetta regarding scheduling Billy Mangold and Mechelle Henry depositions; edit Notice of Deposition for Mangold and Henry depositions; email to team regarding August 17 depositions; review email from C. Kendrick regarding deposition rescheduling; email to and from legal assistant regarding subpoena rules, witness fees and subpoena procedure			
MIM	07/22/04	1.50	0.00 0.00	B	Review emails from E. Thompson and Harold Pizetta re scheduling depositions; telephone conference with Billy Berryhill re scheduling depositions; telephone conference with E. Thompson re scheduling depositions; conference with W. Drinkwater re noticing depositions	4705776		
MIM	07/23/04	1.00	0.00 0.00	B	Edit deposition notices for Billy Mangold and Mechelle Henry; draft deposition notices for Wanda Gillom, Deborah Stewart and Yutaska Simpson; telephone message to H. Pizetta regarding dates for depositions; sign and file deposition notices and cover letters to H. Pizetta and clerk	4723844		
MIM	07/26/04	0.50	0.00 0.00	B	Scan and email Notices of Deposition to Children's Rights team; schedule conference room for depositions; conference with K. Durham re videotaping depositions; review emails from S. Nothenberg re videotaping depositions and scheduling additional meetings; review emails from E. Thompson and Harold Pizetta re dates for depositions; telephone message to E. Thompson re Harold Pizetta's email; telephone conference with W. Drinkwater re Harold Pizetta's email; review email from W. Drinkwater re Harold Pizetta's email	4708078		

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Atty	Date	Hours worked/ Billable	\$'s worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	07/27/04	2.00	0.00	B	Telephone conference with E. Thompson re scheduling depositions with Betty Mallett; telephone message to Betty Mallett re scheduling depositions; telephone conference with Betty Mallett re scheduling depositions; telephone conference with E. Thompson re telephone conversation with Betty Mallett; review letter received from Billy Berryhill re depositions; scan/email letter from Betty Mallett to E. Thompson; telephone message to Betty Mallett re deposition dates; telephone conference with E. Thompson re strategy for scheduling depositions and questions about depositions; conference with W. Drinkwater re scheduling depositions with Betty Mallett	4712164		
MIM	07/28/04	3.25	0.00	B	Review letter received from Betty Mallett re deposition dates; conference with W. Drinkwater re letter from Betty Mallett and plaintiffs' response; scan and email letter from Betty Mallett to E. Thompson; email to and from E. Thompson re plaintiffs' response to Betty Mallett's letter; draft letter to Betty Mallett re depositions; email draft of letter to Betty Mallett to E. Thompson; review past correspondence from E. Thompson, Harold Pizetta and Billy Berryhill re scheduling depositions; review letter from E. Thompson responding to Betty Mallett's letter; conference call with M. Lowry, S. Nothenberg, E. Thompson, C. Carbone, S. Leech and W. Drinkwater re depositions, experts; review and fax information from court reporters re depositions to S. Nothenberg; research for draft motion to compel deposition testimony and email to S. Nothenberg; telephone conference with Judge Nicols'	4712027		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
WWD	07/28/04	0.60	0.00	B	Review correspondence from B.Mallett; conference call regarding response to letter, discovery issues	4710721		
MIM	07/29/04	0.50	0.00	B	Review letter received from Betty Mallett; conference with W.Drinkwater re letter from Betty Mallett and filing motion to compel deposition testimony; review emails from E.Thompson and W.Drinkwater re filing motion to compel	4712042		
MIM	07/30/04	6.00	0.00	B	Edit and revise Plaintiffs' Motion to Compel; telephone conference with E.Thompson and S.Nothenberg regarding Motion to Compel and Betty's fax regarding Motion to Quash; telephone conference with B.Mallett regarding scheduling depositions; edit and revise McNally affidavit; memo in support of Motion to Compel and proposed order; telephone conference with S.Nothenberg regarding changes to motion, memo and order; draft cover letter to J.Nicols requesting oral argument; telephone conference with J.Nicols' law clerk regarding requesting hearing on motion; telephone message to B.Mallett regarding scheduling oral argument	4724127		
WWD	07/30/04	0.60	0.00	B	Receive and review correspondence from B.Mallett; work on proposed motion to compel; conference call with E.Thompson and B.Mallett re discovery; receive and review	4718844		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	08/11/04	1.00	0.00	B	Telephone conference with J.Nicols' court administrator regarding order on Motion to Compel; telephone conference with S.Nothenberg regarding status of order on Motion to Compel; review letter from S.Nothenberg to B.Mallett regarding depositions; telephone conference with S.Nothenberg regarding court reporting service for depositions; conference with K.Durham regarding court reporting services for depositions	4744437		
MIM	08/12/04	0.20	0.00	B	Telephone conference with J.Nicols' court administrator regarding status of order on Motion to Compel	4744587		
MIM	08/17/04	1.00	0.00	B	Emails to and from C.Kendrick regarding depositions and conference call; telephone conference with W.Drinkwater regarding noticing videotaping of depositions; review Miss. Rules of Civil Procedure regarding proper notice of depositions and regarding time limit for service of notices of depositions; conference with K.Durham regarding proper notices of depositions and time limit for service	4761066		
MIM	08/18/04	0.50	0.00	B	Draft Amended Notice of Deposition for Billy Mangold and file; draft cover letter to Betty Mallett; email to and from team regarding amended notice	4761151		
MIM	08/20/04	1.00	0.00	B	Conference with W.Drinkwater regarding deposition of B.Mangold; conference call with S.Nothenberg, M.Lowry, E.Thompson, S.Leech and C.Carbone regarding deposition of B.Mangold; conference with W.Drinkwater regarding technical	4761229		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task Activity
RFH	08/24/04	1.00	0.00 0.00	B	Assisted with preparations for deposition, telephone conference with Brooks Court Reporting to confirm appointment, telephone conference with Kenny regarding Real Time stenography for deposition	4761812	
MIM	08/25/04	4.00	0.00 0.00	B	Set up and prepare for deposition of B.Mangold; conference with M.Lowry, E.Thompson, S.Leech and W.Drinkwater regarding deposition of B.Mangold; conference with members of PACT, M.Lowry, E.Thompson, S.Leech and W.Drinkwater	4761328	
RFH	08/25/04	1.50	0.00 0.00	B	Organized exhibits for deposition, telephone conference with court reporter regarding Real Time software	4762012	
MIM	09/09/04	2.00	0.00 0.00	B	Set up for deposition; lunch meeting with S.Nothenberg and E.Thompson regarding depositions of Jim Johnson and Mechille Henry	4783331	
MIM	09/15/04	1.00	0.00 0.00	B	Telephone conference with B.Mallett regarding rescheduling depositions; telephone conference with S.Nothenberg regarding rescheduling depositions; conference with K.Durham regarding updating CRI on weather and canceling court reporter; review letter from E.Thompson regarding depositions; review letter from B.Mallett regarding depositions	4783407	
MIM	09/30/04	0.50	0.00 0.00	B	Set up for depositions of Sylvia Forester and Zelatra Williams	4796828	

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task Activity
MIM	10/01/04	0.25	0.00 0.00	B	Telephone conference with B.Mallett regarding scheduling deposition of Gail Young; review email from B.Mallett regarding deposition of Gail Young; email to S.Nothenberg, C.Kendricks and A.Wong regarding scheduling deposition of Gail Young	4802206	
MIM	10/04/04	1.00	0.00 0.00	B	Draft request to Mississippi Department of Health/Vital Statistics regarding child deaths in 2003; research and review Mississippi Public Records Act and exceptions in statute	4802276	
MIM	10/05/04	2.00	0.00 0.00	B	Review Mississippi statute regarding accessing public records of vital records bureau; edit letter requesting public records of MS Department of Health	4802313	
MIM	10/08/04	0.50	0.00 0.00	B	Email to and from E.Thompson regarding deposition exhibits and meeting with fiscal expert; conference with K.Durham regarding deposition exhibits; review letter from B.Mallett regarding deposition schedule	4802655	
MIM	10/12/04	0.75	0.00 0.00	B	Email to and from S.Nothenberg regarding cancellation of Yvette Bullock deposition; telephone conference with B.Mallett regarding cancellation of Linda Millsaps deposition; telephone conference with S.Nothenberg and S.Leech regarding cancellation of Linda Millsaps' deposition	4816889	
MIM	10/13/04	7.75	0.00 0.00	B	Work on deposition cancellation issues; telephone conference with S.Leech and E.Thompson regarding cancellation of depositions; draft Motion to Compel/Sanctions; telephone conference with S.Leech and E.Thompson regarding Motion to	4816926	



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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task Activity
MIM	10/14/04	4.25	0.00 0.00	B	Work on and file Motion to Compel Deposition Testimony and for Sanctions; attend meeting with Bill Brister, fiscal expert	4816971	
MIM	10/20/04	0.75	0.00 0.00	B	Work on deposition preparation for Kathy Triplett deposition; conference call with Judge Nicols' law clerk regarding deposition dispute	4817154	
MIM	11/09/04	1.75	0.00 0.00	B	Conference call; conference with W.Drinkwater regarding drafting letter to B.Mallett regarding discovery disputes; draft letter to B.Mallett regarding discovery disputes; edit letter to B.Mallett; email letter to B.Mallett to team for comments	4843041	
MIM	11/10/04	0.50	0.00 0.00	B	Edit and fax/mail letter to B.Mallett regarding discovery disputes	4843204	
MIM	11/11/04	0.25	0.00 0.00	B	Review Mississippi article regarding child abuse	4852654	
MIM	11/12/04	0.50	0.00 0.00	B	Review and edit letter to the editor; email to team regarding letter to the editor	4852661	
MIM	11/16/04	3.00	0.00 0.00	B	Conference call with team; review letter from B.Mallett and scan to team; review Plaintiff's Motion to Compel Production of Case Records; conference with W.Drinkwater regarding filing Motion to Compel; review correspondence with B.Mallett; draft letter to B.Mallett	4872284	
MIM	11/18/04	1.25	0.00 0.00	B	Set up deposition; draft and edit affidavit of Eric Thompson for	4872779	

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index Task Activity
MIM	11/22/04	2.50	0.00 0.00	B	Review Opinion regarding Motion to Dismiss; draft summary of Opinion; review draft press release regarding Motion to Dismiss Opinion	4873785
MIM	11/23/04	1.50	0.00 0.00	B	Conference call; review draft letter to Magistrate Judge; revise letter to Magistrate Judge; scan and e-mail letter to judge to team	4872897
MIM	11/29/04	0.50	0.00 0.00	B	Email to and from team regarding scheduling conference, request for MACWIS documents and fund raiser	4873976
MIM	11/30/04	1.00	0.00 0.00	B	E-mail to and from E.Thompson regarding proposed Order of Dismissal; conference with W.Drinkwater regarding proposed Order of Dismissal; draft cover letter to Judge Lee enclosing proposed Order of Dismissal; telephone conference with Judge Lee's law clerk regarding proposed judgment; e-mail to and from E.Thompson and S.Nothenberg regarding Scheduling Order and MACWIS documents	4873959
MIM	12/01/04	1.50	0.00 0.00	B	Email to team regarding proposed order of dismissal; conference with W.Drinkwater regarding proposed order of dismissal; draft proposed order of dismissal	4879126
MIM	12/02/04	0.50	0.00 0.00	B	Review order setting scheduling conference; scan/email order to team; telephone message to J.Lee's law clerk regarding proposed order	4879586
MIM	12/03/04	1.00	0.00 0.00	B	Email to and from team regarding B.Mallett's letter to Judge	4879646

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	12/06/04	3.00	0.00	B	Email to and from team regarding letter to Judge Lee regarding partial judgment and regarding B.Mallett's proposed extension of time to answer amended complaint; telephone conference with B.Mallett regarding answer; telephone conference with B.Mallett regarding extension; review motion for extension of time and sign agreed order extending defendants' time; review B.Mallett's second letter; review emails from team regarding production of documents; draft letter to B.Mallett regarding telephone conversations and defendants' production of documents	4879660		
MIM	12/07/04	1.50	0.00	B	Edit/revise letter to B.Mallett and fax; telephone conference with team; edit/revise Mississippi public records request; edit/revise E.Thompson's letter to B.Mallett regarding proposed scheduling deadlines; conference with W.Drinkwater regarding letter to Mallett	4893558		
MIM	12/09/04	0.75	0.00	B	Review Scott Co. Times article; review emails regarding public records request; review letter from E.Thompson regarding adoption of W. Children; telephone conference with E.Thompson regarding B.Mallett's response to W.Drinkwater's letter	4893582		
MIM	12/13/04	3.00	0.00	B	Set up status conference call; review defendant's Answer and scan/email to team; scan/email B.Mallett's letter to W.Drinkwater to team; telephone conference with E.Thompson regarding scheduling	4893641		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index Task Activity
MIM	12/14/04	3.00	0.00 0.00	B	Prepare for team conference call; team conference call regarding scheduling order; schedule conference with J.Nicols; email to and from team regarding drafting CMO; telephone conference with B.Mallett regarding CMO; edit/revise proposed Amended CMO	4893658
MIM	12/15/04	1.50	0.00 0.00	B	Revise proposed Amended CMO; telephone conference with S.Nothenberg regarding revising proposed Amended CMO	4893678
MIM	12/16/04	1.00	0.00 0.00	B	Email to and from team regarding proposed Amended CMO delivered to B.Mallett; telephone conference with B.Mallett's secretary; telephone conference with S.Scott regarding CMO; review defendant's suggested changes to CMO	4893699
MIM	12/17/04	1.00	0.00 0.00	B	Email to team defendant's revisions to CMO; edit/revise CMO and submit to Court; draft cover letter to Judge Nicols submitting CMO	4893709
JGAL	12/21/04	0.40	0.00 0.00	B	Receive and review amended case management order and update calendar accordingly	4893318
MIM	12/21/04	1.00	0.00 0.00	B	Conference call with team; email to W.Drinkwater regarding psychiatrist expert and media; email to and from team regarding pre-discovery disclosure; review draft notice of service of pre-discovery disclosures	4908617

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Atty MIM	Date 12/23/04	Hours Worked/ Billable 0.50	\$'s Worked/ Billable 0.00	Status B	Description of Services Rendered	Index	Task	Activity
					Review plaintiffs' second request for production of documents; review plaintiffs' amended initial disclosures; work on filing plaintiffs' notice of service of initial disclosures	4908887		
MIM	12/29/04	0.50	0.00	B	Review initial disclosures received from B.Mallett; telephone conference with C.Kendrick regarding initial disclosures	4908992		
MIM	01/03/05	0.10	0.00	B	Conference with W.Drinkwater regarding child psychiatrist expert	4911930		
MIM	01/04/05	1.00	0.00	B	Prepare for conference call; weekly conference call; conference with W.Drinkwater regarding experts	4911938		
MIM	01/06/05	0.25	0.00	B	Review subpoena to Catholic Charities regarding Jamison; email to W.Drinkwater regarding subpoena	4912745		
MIM	01/07/05	1.00	0.00	B	Conference with W.Drinkwater regarding Catholic Charities subpoena; telephone conference with Steve Carmidy, attorney for Catholic Charities; email to C.Kendrick regarding Release and agreed protective order for Catholic Charities	4925500		
MIM	01/11/05	1.00	0.00	B	Draft cover letter to Catholic Charities enclosing Release and confidentiality order and email to team; conference call ; review letter from B.Mallett regarding production of documents	4925514		
MIM	01/15/05	0.50	0.00	B	Review Defendants' Motion for Extension of Time and scan/email to team; review Defendants' service of supplemental named plaintiff case records and scan/email to team	4925572		

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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity	
MIM	01/17/05	0.50	0.00	B	Review Plaintiff's draft Opposition to Motion for Extension of Time; review J.Lang's e-mail regarding Plaintiff's Opposition to Motion for Extension of Time	4946106			
MIM	01/18/05	2.00	0.00	B	Review re-draft of Plaintiff's Opposition to Notice for Extension of Time, edit same; telephone conference with E.Thompson regarding Defendant's Opposition to Class Certification; research PACER for Defendant's filing of Opposition; conference call with team; telephone conference with M.Lowry	4946223			
MIM	01/19/05	1.00	0.00	B	Prepare and file Plaintiff's Opposition to Defendant's Motion for Extension	4946460			
MIM	01/25/05	0.50	0.00	B	Weekly conference call	4947353			
MIM	01/28/05	1.00	0.00	B	Review plaintiffs' opposition to class certification; review plaintiffs' motion to strike defendants' exhibits; conference with C.Kendrick regarding filing motion to strike and rebuttal brief to class certification; review draft rebuttal brief	4947689			
MIM	01/31/05	5.00	0.00	B	Conference with team regarding filing reply brief to class cert. motion; edit/revise reply to defendants' response; edit/revise plaintiffs' motion to strike exhibit; edit/revise plaintiffs' motion to extend page limit; file reply brief, motion to strike and motion to extend page limit; email proposed order regarding motion to strike to judge; email proposed order regarding motion to extend page limits to judge	4947743			
MIM	02/01/05	1.50	0.00	B	Conference call with team; work on	4960833			

Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task	Activity
MIM	02/02/05	1.00	0.00 0.00	B	Review defendants' Amended Exhibit 1; conference with B.Mallett's office; draft cover letter to B.Mallett enclosing reply brief, plaintiffs' motion to extend page limit and plaintiffs' motion to strike	4960858		
MIM	02/03/05	5.25	0.00 0.00	B	Attend child welfare conference	4960881		
MIM	02/04/05	1.00	0.00 0.00	B	Telephone conference with S.Carmody regarding Catholic Charities records on Jamison; email to team regarding update on Jamison's records; email to team regarding Child Welfare conference	4961028		
MIM	02/08/05	1.00	0.00 0.00	B	Conference call with team regarding document review/discovery; review outstanding discovery requests and correspondence regarding discovery disputes	4961111		
MIM	02/15/05	0.50	0.00 0.00	B	Conference call with team regarding discovery and expert issues	4970006		
MIM	02/16/05	0.50	0.00 0.00	B	Review Defendants' Response to Plaintiffs' Motion to Strike and email to team	4984110		
MIM	02/21/05	1.25	0.00 0.00	B	Draft letters soliciting financial support	4984432		
MIM	02/22/05	1.50	0.00 0.00	B	Revise/edit letters soliciting financial support; conference with Dr. W.Hiatt; conference call with	4984502		

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MIM	02/23/05	1.00	0.00 0.00	B	Telephone conference with Dr. Wood Hiatt regarding psychiatric evaluation of named plaintiff children; email to team regarding telephone conference with Dr. Wood Hiatt; research and prepare documents for Dr. Hiatt	4984398		
MIM	02/24/05	1.50	0.00 0.00	B	Conference with W.Drinkwater; edit/revise letters soliciting financial support; email to team regarding factual summary	4984446		
MIM	02/25/05	3.00	0.00 0.00	B	Review updated fact sheet and edit/revise; draft letter to Dr. Wood Hiatt regarding psychiatric expert analysis; research foundations regarding financial support; email to Lydia Neman and M.Lowry regarding solicitation to foundations	4984475		
MIM	02/28/05	0.50	0.00 0.00	B	Conference with Lydia Newman and Marcia Lowry regarding financial support for expert fees	4984547		
MIM	03/01/05	2.50	0.00 0.00	B	Conference with W.Drinkwater regarding financial solicitation letters; conference call with team; edit/revise and mail B.Mallett agreed order on extension of time; edit/revise financial solicitation letters; telephone conference with B.Mallett	4989877		
MIM	03/02/05	1.00	0.00 0.00	B	Edit/revise financial solicitation letters and mail; edit/revise pro hac vice motion	4989935		
MIM	03/04/05	1.00	0.00 0.00	B	Conference with W.Drinkwater regarding solicitation letters; edit/revise letter to K.Khoury regarding financial solicitation	4990029		



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Atty	Date	Hours Worked/ Billable	\$'s Worked/ Billable	Status	Description of Services Rendered	Index	Task Activity
MIM	03/07/05	2.00	0.00	B	Review email from E.Thompson regarding Defendants' responses to discovery requests; review documents and responses of Defendants and email to E.Thompson; telephone conference with B.Mallett regarding discovery responses; review Defendants' Privilege Log and discovery responses and scan/email to team	5007213	
MIM	03/11/05	0.25	0.00	B	Review E.Thompson's letter to B.Mallett regarding defendants' inadequate discovery responses	5007517	
MIM	03/14/05	1.50	0.00	B	Review Judge Lee's opinion granting class certification and email opinion to the team; review Sun Herald articles regarding DHS authorization; email to and from team regarding class certification motion	5007555	
MIM	03/15/05	1.50	0.00	B	Review letter from E.Thompson to B.Mallett regarding defendants' discovery responses; conference call with team; draft letter to W.Hiatt regarding class certification opinion; review news articles regarding class certification opinion; review draft press release and DHS supporting documents	5007568	
MIM	03/16/05	1.00	0.00	B	Email to team regarding phone calls by potential new plaintiffs; telephone conference with Iva Rigby regarding complaint; draft cover letter to K.Khoury regarding class certification; edit/revise cover letter to W.Hiatt regarding class certification	5024870	
MIM	03/21/05	1.50	0.00	B	Edit/revise plaintiffs' motion for class certification and file	5025748	
MIM	03/22/05	1.00	0.00	B		5026086	

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MIM	03/24/05	1.00	0.00	B	Conference call with team; review letters received from B.Mallett and review documents received	5026259	
MIM	03/29/05	1.00	0.00	B	Edit/revise motion for admission pro hac vice and file; review DHS documents regarding backlog and conference with team	5026405	
MIM	03/30/05	1.00	0.00	B	Conference call with team regarding discovery; email to W.Drinkwater regarding financial support; review final draft of press release regarding DHS backlog documents	5026454	
MIM	03/31/05	1.00	0.00	B	Telephone conference with C.Reeves regarding related lawsuit against DHS; review Clarion Ledger article; email to team regarding C.Reeves; conference with W.Drinkwater regarding media interest on backlog of cases	5026567	
MIM	04/05/05	3.00	0.00	B	Review Clarion Ledger editorial; review DHS documents received from B.Mallett; review 30(b)(6) notices and schedule depositions	5029640	